

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF NEW YORK**

PleasrDAO, an exempted foundation company,

*Plaintiff,*

Case No. 24-cv-4126

V.

Martin Shkrelidze,

*Defendant.*

## DECLARATION OF STEVEN COOPER

Steven Cooper declares as follows under 28 U.S.C. § 1746:

1. I am a partner at the law firm Reed Smith LLP, counsel for PleasrDAO (“PleasrDAO”).

2. I submit this Declaration in support of PleasrDAO's Order to Show Cause for Temporary Restraining Order and for Prejudgment Relief (the "Motion").

3. I am fully familiar with the facts and circumstances set forth below, and all the evidence set out in this Declaration is based on my personal knowledge. I submit this Declaration without any intent or authority to waive or prejudice any privilege or immunity held by PleasrDAO or any other client.

4. On June 11, 2024, I also attempted to provide notice of the Motion to Shkreli by having the Motion transmitted to the attorneys that represented Shkreli in previous criminal and civil actions. A true and correct copy of correspondence with those attorneys is attached as **Exhibit A.**

5. Even if Shkreli has not yet received notice of the Motion, the Court may issue a temporary restraining order without written or oral notice to Shkreli because he may, if given

advanced notice, publicly disseminate copies of *Once Upon a Time in Shaolin* by the Wu-Tang Clan (the “Album”) as to irreparably harm PleasrDAO.

6. Shkreli’s intention to disseminate the Album with advanced notice of the Motion is clear from his increasingly hostile reactions to PleasrDAO’s recent public activity concerning the Album. Those actions and Shkreli’s responses are described in the accompanying Declaration of Matthew Matkov dated June 10, 2024 and its annexed exhibits.

I declare under penalty of perjury that the foregoing is true and correct.

Date: June 11, 2024

/s/ Steven Cooper

Steven Cooper